

September 1, 2009

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: CC Docket No. 96-45 In the matter of Federal-State Joint Board on
Universal Service and TracFone Wireless, Inc., *et al*
Petition for Modification of Annual Verification Condition
NOTICE OF EX PARTE PRESENTATION

Dear Ms. Dortch:

On August 31, 2009, Javier Rosado, Senior Vice President, Lifeline Services, TracFone Wireless, Inc., and I met with Gina Spade, Elizabeth Valinoti McCarthy, and Wesley Platt, all of the Wireline Competition Bureau's Telecommunications Access Policy Division. During this meeting, we discussed TracFone's pending petition for modification of the annual verification condition imposed upon TracFone as a condition in the Commission's September 2005 order granting TracFone's petition for forbearance. By its petition, TracFone has requested that the condition be modified so as to allow TracFone to verify annually that its Lifeline customers remain head of household and receive Lifeline-supported service only from TracFone based upon a statistically-valid sample of those customers. Grant of the petition would make this condition consistent with the Commission's annual verification rule generally applicable to Eligible Telecommunications Carriers who offer Lifeline services. TracFone's position expressed during the meeting were consistent with those previously expressed in its petition and in filed comments.

During the meeting, we provided the staff with a document summarizing TracFone's verification methods and containing certain data regarding its first annual verification efforts. A copy of that document is attached.

This letter is being filed electronically pursuant to Section 1.1206(b) of the Commission's rules. If there are questions, please contact undersigned counsel for TracFone.

Sincerely,



Mitchell F. Brecher

Enclosure

cc: Ms. Gina Spade
Ms. Elizabeth Valinoti McCarthy
Mr. Wesley Platt

Appendix 3

REMARKS	Days	Period before date	Scripts No Usage	Channels				% of Verifiable Mail Recd	% of Total Ver															
				SMS	Voice	Combo	Direct Mail			PROM	From Mail	Oct-09	Nov-09	Dec-09	Jan-10	Feb-10	Mar-10	Apr-10	May-10	Jun-10	Jul-10	Aug-10	Sep-10	Oct-10
REMARKS	189 Days		3	5	1	1	1	26		\$ 119,878	\$ 167,176	\$ 248,435	\$ 220,082	\$ 239,297	\$ 412,494	\$ 529,646	\$ 482,136	\$ 554,162	\$ 565,458	\$ 509,489	\$ 580,035	\$ 480,602	\$ 540,538	\$ 480,614
	423 Days		7	3	0	1	0	19		\$ 25,328	\$ 35,583	\$ 52,131	\$ 46,499	\$ 50,558	\$ 87,131	\$ 111,903	\$ 101,907	\$ 117,104	\$ 119,469	\$ 126,744	\$ 122,549	\$ 103,673	\$ 114,204	\$ 101,544
WEEKEND - 1762 DAYS			16	6	1	2	1	45		\$ 145,025	\$ 202,739	\$ 298,086	\$ 266,580	\$ 289,855	\$ 489,645	\$ 641,549	\$ 584,283	\$ 671,366	\$ 664,927	\$ 726,633	\$ 792,585	\$ 594,366	\$ 654,743	\$ 582,157
																						Total		
Annual Ver. Direct Mailers Sent /										Oct-09	Nov-09	Dec-09	Jan-10	Feb-10	Mar-10	Apr-10	May-10	Jun-10	Jul-10	Aug-10	Sep-10	Oct-10	Nov-10	Dec-10
Active Subs Per Month										62,500	87,264	128,691	114,743	124,791	215,060	276,139	311,473	288,973	394,810	311,761	367,410	255,800	281,818	259,575
Projected Mail Costs Per Month										\$66,250	\$92,500	\$186,412	\$121,628	\$132,247	\$227,964	\$392,707	\$266,561	\$306,311	\$312,499	\$331,527	\$320,555	\$271,180	\$286,727	\$265,610
Verification Processing 50% Return										\$13,750	\$47,123	\$69,493	\$61,961	\$67,371	\$116,132	\$148,115	\$125,795	\$156,045	\$159,197	\$168,891	\$163,902	\$138,148	\$152,182	\$135,311
																						Total		
Total																						\$3,442,677		
Total																						\$1,753,817		
Total																						\$12,742,074		
																						TOTAL AVG \$ per sub		
																						\$5.92		

Direct Mail Forms Avg Cost Per Unit \$1.06 Based on PMP Inventory, Production, and Postage Per Unit for 2009
 VMSB Verification Processing / No \$1.08 Based on AVG of Mailbox & Web Verification Pricing

NOV and all others - Automated - Starting SEP 02, 2009

Job 1278

Message	Channels	Day of the month	Communication	Creative references to Job 1271
1st level – Informational	SMS, E-mail and Voice blast	2nd	Refer to SEP Job	A1 - SMS, E-mail - Add Expiration date (15)
2nd level – Reminder	SMS and E-mail	14th	Refer to SEP Job	A2 - SMS, E-mail -- Add Expiration date (15)
3rd level – Warning	SMS, E-mail, and Direct Mail all inclusive	27th	NEW	NEW SMS and Email - GRAFIC DESIGN not letter format. See specs. - Add Expiration date (15) / A1 - Direct Mail
4th level – Final Warning	SMS, E-mail and Voice blast	10th	NEW	NEW SMS and Email - GRAFIC DESIGN not letter format. See specs. - Add Expiration date (15) (Last chance) / A3 Voice message should be modified to voice blast with a Similar verblage and including that it is the last chance to verify.
5th level – New Period Starts - Warning	SMS, E-mail, Outbound with Voice message	16th	NEW	A3 - SMS, Email - GRAFIC DESIGN not letter format and Outbound with voice message. A3 Voice Blast should be updated with similar verblage to voice message and adding the NEW chance, the NEW Expiration date (30) and 30 extra minutes upon positive verification. Please add that this is the Last chance.
6th level – Final warning	SMS and E-mail	21nd	NEW	NEW SMS and Email - GRAFIC DESIGN not letter format reinforce the expiration date and the 30 bonus minutes.
7th level – Final warning	SMS, E-mail and Voice blast	28th	Refer to SEP Job	A4 - SMS and E-mail - Cancellation advise and A3 - Voice Blast
8th level – Winback	SMS, E-mail and Direct Mail	2nd	Refer to SEP Job	A5 - SMS and E-mail and Direct Mail see specs.
9th level – Winback	SMS, E-mail and voice blast	13th	Refer to SEP Job	A6 - SMS and Email and A5 - Voice Blast
10th level – Winback	SMS and E-mail	26th	NEW	New. See specs - Email with - GRAFIC DESIGN not letter format

Reminder based upon service due date, not enrollment.

Job TBA

Message	Channels	Days before phone's due date	Communication	
1st level – Reminder	SMS, E-mail and Outbound with Voice Message	50 Days	New	New
2nd level – Reminder	SMS and E-mail	55 Days	New	New
3rd level – Reminder	SMS and E-mail	59 Days	New	New

ADHOC - January - 4 months in advance

Job TBA

Message	Channels	Days before and after cancelation	Communication
Generic Verify!			

Safelink Schedule - Verification

AUG ESN's - Starting JULY 08, 2009

Job 1253

Message	Channels	Day of the Month	Communication
1 st level – Informational	SMS, E-mail, Outbound with Voice message and Direct Mail all inclusive	8th day of July	New
2 nd level – Reminder	SMS, E-mail, Outbound with Voice message	14th day of July	Same as previous
3 rd level – Warning	SMS, E-mail, Outbound with Voice message	21th day of July	New
4 th level – Final warning	SMS, E-mail, Outbound with Voice message	28th day of July	Same as previous
5th level – Winback	SMS and E-mail	1st day of Aug	New

SEP / OCT ESN's - Starting AUG 03, 2009 and SEP 02, 2009

Job 1271

Message	Channels	SEP Qualified ESN's	OCT Qualified ESN's
1st level – Informational	SMS, E-mail, Voice Blast message and Direct Mail all inclusive	Monday, Aug 03	Wednesday, Sep 02
2nd level – Reminder	SMS and E-mail	Thursday, Aug 13	Thursday, Sep 10
3rd level – Warning	SMS, E-mail, Outbound and Verification form by mail	Thursday, Aug 20	Thursday, Sep 17
4th level – Final warning	SMS and E-mail	Tuesday, Aug 28	Monday, Sep 28
5th level – Winback	SMS, E-mail, Voice Blast message	Wednesday, Sep 02	Friday, Oct 02
6th level – Winback	SMS and E-mail	Wednesday, Sep 09	Friday, Oct 09